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*Counsel for Ryan Drexler*

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA

In re

MP REORGANIZATION

Debtor.

Case No. BK-22-14422-NMC

Chapter 11

Hearing Date: March 19, 2024

Hearing Time: 9:30 a.m.

**DECLARATION IN SUPPORT OF MOTION TO WITHDRAW**  
**AS COUNSEL FOR RYAN DREXLER**

Brian D. Shapiro, hereby states:

1. Affiant is counsel for Ryan Drexler ("**Drexler**") in the above matter. Unless otherwise stated herein on information and belief, I have personal knowledge of the facts and circumstances stated in this Declaration. I am competent to testify to the same.
2. Affiant and his firm (collectively the "**Firm**") was retained by Drexler to act as local counsel for Michael Richman ("**Richman**"). The Firm assisted Richman in such capacity until Richman withdrew as counsel in the bankruptcy case. (ECF No. 946). After Richman's withdrawal, BG Law LLP ("**BG**") appeared in the bankruptcy case and represented Drexler as his counsel in the bankruptcy case and in a related adversary proceeding. At the request of Drexler, the Firm's role in the bankruptcy case was limited and the Firm did not actively

1 participate in any further proceedings once BG Law became involved. Drexler has not  
2 retained the Firm to actively participate in the bankruptcy case nor any adversary proceeding.

3 3. Drexler has not retained the Firm for any further representation, and if requested, the Firm  
4 would decline. The Firm held off on filing a motion to withdraw as he had a concern that  
5 his withdrawal could have a material adverse effect on Drexler. Now that the confirmation  
6 evidentiary hearing has been held and that BG has filed a motion to withdraw as well, there  
7 is no material adverse effect by Shapiro filing such a request.  
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9 4. I declare under penalty of perjury that the foregoing is true and correct.  
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11 Dated February 20, 2024

/s/ Brian D. Shapiro, Esq.

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13 Brian D. Shapiro, Esq.  
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